

CLARK COUNTY SCHOOL DISTRICT  
OFFICE OF THE GENERAL COUNSEL  
CRYSTAL J. HERRERA, ESQ.  
Nevada Bar No. 12396  
BETTY J. FOLEY, ESQ.  
Nevada Bar No. 14517  
5100 West Sahara Avenue  
Las Vegas, Nevada 89146  
Telephone: (702) 799-5373  
Facsimile: (702) 799-7243  
[foleybj@nv.ccsd.net](mailto:foleybj@nv.ccsd.net)

Phillip N. Smith, Jr., Esq.  
Nevada Bar No. 10233  
[psmithjr@wwhgd.com](mailto:psmithjr@wwhgd.com)  
Jacqueline V. Nichols, Esq.  
Nevada Bar No. 14246  
[jnichols@wwhgd.com](mailto:jnichols@wwhgd.com)

WEINBERG, WHEELER, HUDGINS,  
GUNN & DIAL, LLC  
6385 South Rainbow Blvd., Suite 400  
Las Vegas, Nevada 89118  
Telephone: (702) 938-3838  
Facsimile: (702) 938-3864

*Attorneys for Defendant*  
*Clark County School District*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

FELICIA HAYES,

Plaintiff,

v.

CLARK COUNTY SCHOOL DISTRICT,

Defendant.

Case No. 2:22-cv-02167-MMD-NJK

**ORDER GRANTING STIPULATION  
AND ORDER TO EXTEND JOINT  
PRETRIAL ORDER DEADLINE**

**(SECOND REQUEST)**

Pursuant to LR IA 6-1, LR IA 6-2, LR 26-3, Plaintiff FELICIA HAYES (“Plaintiff”), by and through her attorney of record, and Defendant CLARK COUNTY SCHOOL DISTRICT (“Defendant”), by and through its attorneys of record, hereby stipulate and request that this Court

1 extend the Joint Pretrial Order deadline of March 5, 2025 (ECF 42), for thirty (30) days, up to and  
2 including April 4, 2025. This is the second request for an extension of time to the Joint Pretrial  
3 Order deadline. This request is made within twenty-one (21) days of the current deadline, and the  
4 parties believe there is good cause for the extension.

5 IN CONSIDERATION OF THE FOLLOWING:

- 6 1. On August 19, 2024, pursuant to the Court's Order (ECF 42) Granting in Part and  
7 Denying in Part Defendant's Motion for Summary Judgment, pursuant to LR 16-5 this  
8 case was referred to the Magistrate Judge for a settlement conference. The Order also  
9 directed that if the case did not settle, the parties must file their joint pretrial order 30  
10 days after the conclusion of the settlement conference. ECF 42, p. 11.
- 11 2. A settlement conference was originally scheduled for November 6, 2024 (ECF 43) but  
12 did not proceed due to Plaintiff's counsel's family medical emergency that day (ECF  
13 45). The settlement conference was reset to January 2, 2025 (ECF 47).
- 14 3. The settlement conference was not successful. (ECF 48).
- 15 4. The parties have significantly differing views regarding how trial should proceed,  
16 based on the Court's Order (ECF 42) on Defendant's Motion for Summary Judgment,  
17 so the parties entered into a First Stipulation to Extend Joint Pretrial Order Deadline to  
18 March 5, 2025. ECF 49.
- 19 5. On January 23, 2025, the Court entered an Order Granting the [First] Stipulation to  
20 Extend Joint Pretrial Order Deadline to March 5, 2025. ECF 50.
- 21 6. The parties have engaged in discussion and exchanged drafts of the Joint Pretrial  
22 Order.
- 23 7. Defendant has disclosed 24 documents, comprised of approximately 3200 Bates  
24 stamped pages. Plaintiff has produced approximately 360 pages in response to written  
25 discovery requests. Due to the extensive disclosure record, the parties request  
26 additional time to adequately review and resolve disputes they may have regarding the  
27 scope of evidence to be presented at trial, in accordance with the requirements outlined  
28 in LR 16-3 for a proposed Joint Pretrial Order.

8. In addition, Defendant has recently retained outside counsel, Jackie V. Nichols, Esq., to assist in the trial in this matter.

9. In light of the recent retention, Ms. Nichols needs additional time to participate in the pre-trial conferences, including reviewing the above-mentioned records and reviewing the parties' Joint Pretrial Order thus far.

10. This is the parties' second Stipulation to Extend the Joint Pretrial Order deadline. It is not submitted for the purpose of delay, but rather, is submitted in a good faith effort to narrow and define the scope of evidence to be presented at trial.

NOW THEREFORE, THE PARTIES HEREBY STIPULATE that deadline to file the Joint Pretrial Order be extended for an additional 30 days to April 4, 2025. This request is made in good faith and not for the purpose of delay.

DATED: 3/5/25

DATED: 3/5/25

CLARK COUNTY SCHOOL DISTRICT  
OFFICE OF THE GENERAL COUNSEL

PLAINTIFF FELICIA HAYES

By: /s/ Betty Foley

By: /s/ Richard Segerblom

Betty J. Foley, Esq.  
Nevada Bar No. 14517  
5100 West Sahara Avenue  
Las Vegas, NV 89146

Richard Segerblom, Esq.  
Nevada Bar No. 1010  
602 S. 10<sup>th</sup> Street  
Las Vegas, NV 89101  
*Attorney for Plaintiff*

Jackie V. Nichols, Esq.  
Nevada Bar No. 14246  
WEINBERG, WHEELER, HUDGINS,  
GUNN & DIAL, LLC  
6385 South Rainbow Blvd., Suite 400  
Las Vegas, NV 89118

*Attorneys for Defendant  
Clark County School District*

**IT IS SO ORDERED.**



UNITED STATES DISTRICT JUDGE

DATED: March 6, 2024